

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON,

Plaintiff,

v.

ALDERWOOD SURGICAL CENTER, LLC, a
Washington limited liability company;
NORTHWEST NASAL SINUS CENTER P.S.,
a Washington professional service corporation;
and JAVAD A. SAJAN, M.D.,

Defendants.

NO. 2:22-cv-01835-RSM

DECLARATION OF JAVAD SAJAN, MD

I, Javad Sajjan MD, declare as follows:


1. I am over the age of 18 and am competent to testify as to the statements in this declaration. I make the following statements based upon personal knowledge.
2. I am the owner of Allure of Esthetic.
3. I understand that the Washington Medical Commission (“WMC”), through investigations of at least two complaints, has reviewed copies of the Third Agreement.
4. We received letters from the WMC that said that a panel of three Commissioners reviewed the complaints and closed the complaints.

5. The practice also obtained copies of the case history through a public records request. For one of the cases involving the WMC, there is a notation next to the case number and description that says, “If allegations are true, no violation of law occurred”.

6. Alderwood took the closure letter and summary of complaints to mean that the WMC found no wrongdoing with the use of the third Agreement, and we could continue to use the Third Agreement. If the WMC told us that the forms were unlawful, we would have stopped using the Third Agreement immediately.

The foregoing statements are made under penalty of perjury under the laws of the State of Washington.

Signed in Seattle, WA this 1 day of October, 2023.

By: 
Javad Sajjan, MD